

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF WEST VIRGINIA

THE CITY OF HUNTINGTON,
Plaintiff,

v.

Civil Action No. 3:17-01362

AMERISOURCEBERGEN DRUG
CORPORATION, et al.
Defendants.

CABELL COUNTY COMMISSION,
Plaintiff,

v.

Civil Action No. 3:17-01665

AMERISOURCEBERGEN DRUG
CORPORATION, et al.
Defendants.

**PLAINTIFFS' NOTICE OF RULE 30(b)(6) REMOTE VIDEOTAPED DEPOSITION OF
MALLINCKRODT LLC**

PLEASE TAKE NOTICE that in accordance with Rule 30(b)(6) of the Federal Rules of Civil Procedure and pursuant to the applicable Federal Rules of Civil Procedure as well as all other orders and rules governing this litigation, Plaintiffs, by and through undersigned counsel, will take the oral videotaped deposition of **MALLINCKRODT LLC**, on **July 31, 2020 at 10:00 AM (Eastern Standard Time) remotely** or another date, time, and location to be determined at the mutual convenience of the parties on the following subject matters.

1. Validation and authentication of your productions In Re: National Prescription Opiate Litigation MDL 2804 to date.

Attached hereto as Exhibit 1 is a copy of the subpoena to Mallinckrodt LLC for attendance at the deposition.

The deposition shall be videotaped and recorded stenographically and will continue from day to day until completed before a person duly authorized to administer oaths who is not

counsel of record or interested in the events of this case. The oral examination is to be taken for purposes of discovery, for use at trial, or for such other purposes as are permitted under the Federal Rules of Civil Procedure, the local rules of the United States District Court for the Southern District of West Virginia, and all Pretrial Orders and Case Management Orders entered by the Court. Court reporting services and video recording services will be provided by Golkow Global Litigation Services. Parties who wish to attend may RSVP to the deposition by emailing scheduling@golkow.com.

Dated: July 27, 2020

Respectfully submitted,

THE CITY OF HUNTINGTON

/s/ Anne McGinness Kearse

Anne McGinness Kearse (WVSB No. 12547)

Joseph F. Rice

MOTLEY RICE LLC

28 Bridgeside Blvd.

Mount Pleasant, SC 29464

Tel: 843-216-9000

Fax: 843-216-9450

akearse@motleyrice.com

jrice@motleyrice.com

Linda Singer

David I. Ackerman

MOTLEY RICE LLC

401 9th Street NW, Suite 1001

Washington, DC 20004

Tel: 202-232-5504

Fax: 202-386-9622

lsinger@motleyrice.com

dackerman@motleyrice.com

Charles R. "Rusty" Webb (WVSB No. 4782)

THE WEBB LAW CENTRE, PLLC

716 Lee Street, East

Charleston, West Virginia 25301

Telephone: (304) 344-9322

Facsimile: (304) 344-1157

rusty@rustywebb.com

CABELL COUNTY COMMISSION

/s/ Paul T. Farrell, Jr.

Paul T. Farrell, Jr. (WVSB Bar No. 7443)

FARRELL LAW

P.O. Box 1180

Huntington, WV 25714-1180

422 Ninth Street, 3rd Floor

Huntington, West Virginia 25701

office: 304.523.7285

cell: 304.654.8281

email: paul@farrell.law

Michael A. Woelfel (W.Va. Bar ID 4106)

WOELFEL AND WOELFEL, LLP

801 Eighth Street

Huntington, West Virginia 25701

304.522.6249

304.522.9282: fax

mikewoelfel3@gmail.com

CERTIFICATE OF SERVICE

I hereby certify that on July 27, 2020, the PLAINTIFFS' NOTICE OF RULE 30(b)(6) REMOTE VIDEOTAPED DEPOSITION OF MALLINCKRODT LLC was served on all counsel via email only to plaintiffs' listserv at mdl2804discovery@motleyrice.com and defendants' listservs at track2opioiddefendants@reedsmit.com.

/s/ Monique Christenson

Monique Christenson (SC Bar No. 104063)
Motley Rice LLC